

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

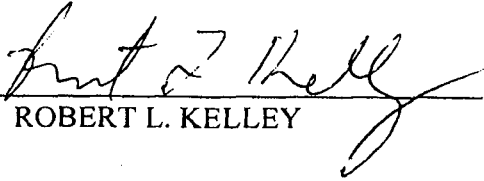
INSITUFORM TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 04 10487 GAO
)	
AMERICAN HOME ASSURANCE COMPANY,)	
)	
Defendant.)	

SUPPLEMENTAL AFFIDAVIT OF ROBERT KELLEY


I, Robert L. Kelley, am of counsel in the general counsel's office of Insituform Technologies, Inc. ("Insituform"). The following is based on personal knowledge or my investigation and is true and correct to the best of my understanding:

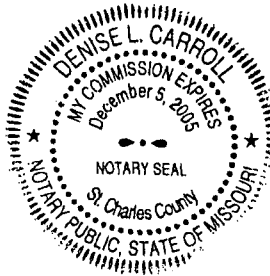
1. Liberty Mutual investigated the MWRA claim and determined that the claim was covered under the Liberty Mutual policy issued to Insituform. A true and correct copy of Liberty Mutual's December 10, 2004, acknowledgement of coverage is attached hereto as Exhibit A.
3. The total amount of the claim submitted to Liberty Mutual was \$6,824,000.
2. Liberty Mutual has indemnified Insituform with respect to the MWRA claim in an amount equal to its limit of liability under the Liberty Mutual primary policy, \$1,000,000 minus a \$250,000 deductible. A true and correct copy of the checks issued by Liberty Mutual in satisfaction of its indemnity obligation are attached hereto as Exhibit B.

FURTHER AFFIANT SAYETH NAUGHT.

By: 
ROBERT L. KELLEY

Signed and Sworn to before
me this 25th day of March, 2005


Notary Public



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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the following document was served upon the attorney of record for the Defendant by virtue of electronically filing this document with the Court on the 22nd day of April 2005.

Supplemental Affidavit of Robert Kelley

By: /s/ Stanley A. Martin
Stanley A. Martin, Esq.
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